

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERRORIST ATTACKS ON SEPTEMBER 11, 2001	)	Civil Action No. 03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

*All Cases*

**AKRAM ALZAMARI'S OBJECTIONS TO PLAINTIFFS'  
NOTICE OF DEPOSITION AND DIRECT AND RE-DIRECT  
EXAMINATION QUESTIONS FOR AKRAM ALZAMARI**

Pursuant to Federal Rule of Civil Procedure 32(d), Akram Alzamari ("Alzamari") hereby objects to Plaintiffs' deposition notice and, as set forth below, to certain of Plaintiffs' July 19, 2019 direct examination questions and August 9, 2019 re-direct examination questions. Alzamari does not have any objections to the Kingdom of Saudi Arabia's cross examination questions or re-cross examination questions.

For the avoidance of doubt, Alzamari objects to the attendance at the deposition by any members of the Plaintiffs' Executive Committees ("Plaintiffs") and/or the Kingdom of Saudi Arabia and Dallah Avco ("Defendants"). Judge Netburn's May 29, 2019 Order ("May 29 Order") directed that this deposition be conducted by written questions pursuant to Rule 31 of the Federal Rules of Civil Procedure.

**A. Plaintiffs' July 19, 2019 Deposition Notice**

Alzamari objects to the location of the deposition listed in Plaintiffs' deposition notice. Alzamari also objects to Plaintiffs' reservation of rights regarding an oral deposition of the witness after the completion of the written deposition. The Court's May 29 Order forecloses this possibility.

**SUBJECT TO FBI PROTECTIVE ORDER**

Alzamari further objects to the statements in the deposition notice that the deposition shall “continue day to day until complete” and that the deposition questions cannot be shared with the witness in advance of the deposition as inconsistent with the Court’s August 6, 2019 Order.

**B. Plaintiffs’ July 19, 2019 Direct Examination Questions**

Alzamari interprets Plaintiffs’ direct examination questions to require that, where a direct examination question is preceded by “[If so]” or some other indication that the asking of the question is conditioned on a certain answer to a prior question, such follow-up questions will be asked only if the condition is first satisfied. Alzamari objects to all such follow-up questions to the extent they are asked without the applicable condition being satisfied by a prior answer. Alzamari also objects to each of Plaintiffs’ purported subject headings that are not phrased in the form of a question. Those subject headings should not be read or shown to the witness during the deposition.

Alzamari further objects to the suggestions in the following questions that the FBI reports that have been produced by the FBI are interview statements: 111, 122, 130a, 139a, 151a, 168a, 212, 219, 225. These objections can be resolved by changing the introduction to these questions to: “Could you please look at [Bates number]. This purports to be a summary, prepared by the FBI, of an interview that you provided to the FBI.”

Alzamari objects to the form of the following direct examination questions: 24, 27f, 29b, 29c, 30e, 31e, 38b, 39c, 39d, 40k, 40q, 47h, 47o, 49h, 56b, 62b, 69c, 71e, 73a, 74a, 75a, 75d, 75e, 77e, 77f, 80, 82a, 82b, 82c, 83a, 84a, 86, 88a, 88b, 88c, 89a, 90a, 90c, 93, 96a, 96b, 96e, 98b, 99a, 108c, 110, 112a, 112b, 112c, 115, 118i, 119c, 120b, 120c, 120d, 121a, 121b, 123a, 123b, 123c, 123d, 124b, 125a, 125b, 126, 130b, 130c, 130d, 135, 137a, 137b, 137c, 138c, 139b,

139c, 139d, 141, 142, 143a, 144b, 147b, 148a, 148b, 150a [first one], 150d, 150e, 151b, 151c, 151d, 153, 168b, 168c, 168d, 173b, 196, 197, 198, 199, 201, 204a, 204b, 206a, 213a, 213b, 213c, 220a, 220b, 220c, 220d, 220e, 222b, 223, 224, 226a, 226b, 226c, 230b, 231b, 235a, 235b, 236a, 244f, 244g, 244h, 244i.

Alzamari's objection to the form of the following direct examination questions can be resolved by adding "[If so]" or some other indication that the asking of the question is conditioned on a certain answer to a prior question, assuming there are no other objections to that question: 27f, 29b, 29c, 31e, 38b, 39c, 39d, 40k, 40q, 47h, 69c, 71e, 73a, 74a, 75a, 75d, 80, 82a, 82b, 82c, 83a, 84a, 86, 88a, 88b, 88c, 89a, 90a, 90c, 93, 96a, 96b, 96e, 98b, 99a, 110, 115, 120b, 120c, 120d, 121a, 121b, 124b, 125a, 125b, 126, 137a, 137b, 137c, 138c, 141, 142, 143a, 144b, 147b, 148a, 148b, 150a [first one], 150d, 150e, 153, 196, 197, 198, 199, 201, 204a, 204b, 206a, 222b, 223, 224, 235b, 244f, 244g, 244h, 244i.

Similarly, Alzamari's objections to the form of the following direct examination questions can be resolved, assuming there are no other objections to that question, with the suggested changes included herein:

Question Number(s)	Modification
24, 118i, 119a, 119c, 235a, 236a	Change "Before and after" to "Before or after"
30e	Change "her" to "he"
108c	Delete first "that"
112a, 112b, 112c, 123a, 123b, 123c, 123d, 130b, 130c, 130d, 135, 139b, 139c, 139d, 151b, 151c, 151d, 168b, 168c, 168d, 213a, 213b, 213c, 220a, 220b, 220c, 226a, 226b, 226c	Change "statement" to "passage"

Alzamari objects to the following questions on the basis of lack of foundation: 31a, 31d, 32a, 42c, 47j, 54, 65, 69a, 70a, 82a, 83a, 88a, 88b, 89a, 106b, 110, 113, 114, 115, 116a, 117a, 118a, 118e, 118i, 119a, 120a, 126, 128a, 129a, 130b, 131, 133, 134, 138a, 140, 145a, 147a, 148a, 149a, 151b, 154, 155, 156a, 156e, 157e, 162, 183, 221b, 227, 232a, 234a, 243c.

Alzamari's objections regarding the lack of foundation for the following direct examination questions can be resolved, assuming there are no other objections to that question,

Alzamari objects to the following direct examination questions because, as phrased now, they are beyond the scope of the Court's May 29 Order: 3, 4, 4a, 4b, 5, 6, 9, 10, 11, 11a, 13, 14, 14a, 14b, 14c, 31b, 46a, 46b, 46c, 48a, 48b, 64a, 64b, 64c, 146d, 167c, 188, 238i, 243e, 243f, 243g, 243h, 243i, 243j. To the extent these questions are asked, Alzamari will be directed not to answer. Objections to the following direct examination questions that are beyond the scope of the Court's May 29 Order can be resolved, assuming there are no other objections to that question, if they are reworded to ask for Alzamari's personal knowledge and/or observations: 31b, 46a, 46b, 46c, 48a, 48b, 64a, 64b, 64c, 146d, 167c, 188, 238i, 243e, 243f, 243g, 243h, 243i, 243j.

To minimize confusion and streamline the questioning, Alzamari proposes adding an instruction to the court reporter along the lines of, "If no, skip to question number [ ]," after the following direct examination questions: 2, 27d, 28a, 29a, 30a, 30c, 31d, 32a, 33b, 33e, 34a, 35a, 36a, 37a, 38a, 39a, 39f, 40a, 40c, 40g, 40j, 40m, 40p, 43a, 44a, 44c, 46a, 47a, 47c, 47f, 48a, 49a, 49d, 56a, 56e, 62a, 64a, 66a, 67a, 68a, 69a, 70a, 71a, 72, 76a, 77a, 78c, 78f, 79, 81a, 85, 87a,

91a, 91d, 92, 94a, 97, 100, 108b, 108e, 109a, 113, 116a, 117a, 118a, 118e, 118i, 119a, 120a, 124a, 128a, 129a, 136b, 138a, 144a, 145a, 147a, 149b, 150a [second one], 157a, 158c, 159a, 162, 164a, 165c, 166a, 167c, 175a, 176a, 177, 179, 181, 188, 189c, 190a, 191a, 205a, 206a, 221a, 222a, 228a, 228c, 228e, 228j, 229a, 230a, 231a, 232a, 233a, 234a, 235a, 236a, 237a, 238a, 238d, 239b, 240a, 241a, 242c, 243a, 243c, 243e, 243h, 244e.

### **C. Plaintiffs' August 9, 2019 Re-Direct Examination Questions**

Alzamari interprets Plaintiffs' re-direct examination questions to require that, where a re-direct examination question is preceded by "[If so]" or some other indication that the asking of the question is conditioned on a certain answer to a prior question, such follow-up questions will be asked only if the condition is first satisfied. Alzamari objects to all such follow-up questions to the extent they are asked without the applicable condition being satisfied by a prior answer.

Alzamari objects to the form of the following re-direct examination questions: 7, 10, 12, 15, 16, 17, 19, 21, 22, 27(ii), 30, 32.

Alzamari's objection to the form of the following re-direct examination questions can be resolved by adding "[If so]" or some other indication that the asking of the question is conditioned on a certain answer to a prior question, assuming there are no other objections to that question: 12, 17, 19, 22, 27(ii), 30, 32.

Similarly, Alzamari's objections to the form of the following re-direct examination questions can be resolved, assuming there are no other objections to that question, with the suggested changes included herein:

Question Number	Modification
16	Change "those Saudi two" to "those two Saudi"
21	Remove "the" before "two"

Alzamari objects to the following re-direct questions on the basis of lack of foundation:

1a(i), 1b(i), 1c(i), 1d(i), 1e(i), 1f, 1h, 1j, 1l, 2a(vi), 2b(vi), 3, 4, 5, 19, 21, 22, 25.

Alzamari's objections regarding the lack of foundation for the following re-direct examination questions can be resolved, assuming there are no other objections to that question,

[REDACTED]

[REDACTED]

Alzamari objects to the following re-direct examination questions because, as phrased now, they are beyond the scope of the Court's May 29 Order: 1a (and all subparts), 1b (and all subparts), 1c (and all subparts), 1d (and all subparts), 1e (and all subparts), 1m. To the extent these questions are asked, Alzamari will be directed not to answer. Objections to the following re-direct examination questions that are beyond the scope of the Court's May 29 Order can be resolved, assuming there are no other objections to that question, if they are reworded to ask for Alzamari's personal knowledge and/or observations: 28, 29.

Alzamari objects to the following re-direct examination questions as beyond the scope of the Kingdom of Saudi Arabia's cross-examination questions: 34 (and all subparts). To the extent these questions are asked, Alzamari will be directed not to answer.

To minimize confusion and streamline the questioning, Alzamari proposes adding an instruction to the court reporter along the lines of, "If no, skip to question number [ ]," after the following re-direct examination questions: 1f, 1h, 1j, 2a(i), 2b(i), 2c(i), 2d(i), 2e(i), 2f(i), 11, 16, 18, 21, 23, 27, 28.

Dated: August 21, 2019

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/s/ Kelly A. Moore

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**CERTIFICATE OF SERVICE**

I hereby certify that, on August 21, 2019, I caused a copy of the foregoing to be served on counsel for Plaintiffs, the Kingdom of Saudi Arabia, and Dallah Avco via electronic means.

/s/ *Kelly A. Moore*

Kelly A. Moore